

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BRAD AMOS,	)	
	)	Case No. 3:21-cv-00923
Plaintiff,	)	
	)	District Judge Richardson
v.	)	
	)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC, et al,	)	
	)	Jury Demand
Defendants.	)	

**DEFENDANTS' MOTION FOR  
ATTORNEY'S FEES & RELATED NON-TAXABLE EXPENSES**

Defendants, The Lampo Group, LLC (“Lampo”) and Dave Ramsey (“Ramsey”), by and through the undersigned counsel and pursuant to Rule 54(d) of the Federal Rules of Civil Procedure<sup>1</sup>, Local Rule 54.01(b), and Local Rule 7.01(a)(2), move the Court for an award of the reasonable attorney’s fees and related non-taxable costs, totaling \$394,543.09, that they have incurred in defending this case.<sup>2</sup>

On December 13, 2023, the Court dismissed all of Plaintiff’s remaining claims and entered a final judgment against him. (Docs. #136-37). Consistent with Rule 54(b) and Local Rule 54.01(b), Defendants have filed this motion within 30 days following entry of judgment.

As more fully explained in Defendants’ memorandum of law (Doc. #143), Defendants should be allowed to recover their reasonable attorney’s fees and costs from Plaintiff and his counsel pursuant to the Court’s inherent authority, 28 U.S.C. § 1927, 42 U.S.C. § 2000e-5(k),

---

<sup>1</sup> Except as otherwise noted, all references to rules in this motion are to the Federal Rules of Civil Procedure.

<sup>2</sup> Plaintiff has filed a Notice of Appeal. (Doc. #139). Upon entry of the Sixth Circuit mandate, Defendants expect to file a second motion for reasonable attorney’s fees and non-taxable costs in accordance with Local Rule 54.01(b)(2).

and T.C.A. § 50-1-304(e)(2), as the prevailing parties and due to Plaintiff and his counsel's misconduct during the course of this case.

Respectfully submitted,

/s/Leslie Goff Sanders  
Leslie Goff Sanders (TN #18973)  
Daniel Crowell (TN #31485)  
Stephen Stovall (TN #37002)  
BARTON LLP  
611 Commerce Street  
Suite 2603  
Nashville, TN 37203  
Telephone: (615) 340-6790  
lsanders@bartonesq.com  
dcowell@bartonesq.com  
sstovall@bartonesq.com

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I certify that, on January 12, 2024, I filed the foregoing via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

Jonathan A. Street  
Lauren J. Irwin  
Brandon G. Hall  
Cullen D. Hamelin  
THE EMPLOYMENT AND CONSUMER LAW GROUP

*Attorneys for Plaintiff*

/s/Leslie Goff Sanders  
Leslie Goff Sanders (TN #18973)  
*Attorney for Defendants*